

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow,

:

Plaintiff,

:

v.

:

Civil Action No: 3:11-cv-00020-MHL
(Consolidated)

Friedman & MacFadyen, P.A. and
Johnie R. Muncy,

:

:

Defendants.

**MEMORANDUM IN SUPPORT OF
JOINT MOTION TO EXTEND STAY**

As set out in the parties' Joint Motion to Extend Stay, the parties are diligently pursuing attempts to mediate these matters. While those efforts have been underway for some time, and were delayed by circumstances beyond the control of the parties, the efforts have now resulted in initial productions of data and a scheduled mediation date. The parties have worked collaboratively in this regard and are hopeful that the scheduled mediation may resolve these matters.

An extension of stay in these matters will not prejudice any party and, to the extent it is calculated to try to resolve a number of filed and unfiled matters in this District and elsewhere, furthers interests of judicial economy and the administration of justice.

For these reasons and those set out in the parties Motion for Extension of Stay, the parties jointly request that the stay previously entered in this matter be extended until June 15, 2012.

DATED: March 21, 2012

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.
JOHNIE MUNCY**

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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